

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

WM CAPITAL MANAGEMENT, INC. AS)
SUCCESSOR IN INTEREST TO THE)
FEDERAL DEPOSIT INSURANCE)
CORPORATION, AS RECEIVER FOR)
EDGE BROOK BANK,) Case No. 15-CV-9047
)
Plaintiff,)
v.)
)
DZOKO STOJANOV, IVAN TUFEKIEV,)
AND UNKNOWN OWNERS AND NON-)
RECORD CLAIMANTS,)
)
Defendants.)
)
)
)
)

MOTION FOR SERVICE BY PUBLICATION

Now comes WM CAPITAL MANAGEMENT, INC. AS SUCCESSOR IN INTEREST TO THE FEDERAL DEPOSIT INSURANCE CORPORATION, AS RECEIVER FOR EDGE BROOK BANK (“Plaintiff”), by its attorneys, KAVANAGH GRUMLEY & GORBOLD LLC, and moves this Court to grant it leave to serve the Defendant, Ivan Tufekciev, by publication. In support of its motion, Plaintiff states as follows:

1. Plaintiff filed its Verified Complaint on October 13, 2015.
2. Plaintiff has been unable to serve the Defendant, Ivan Tufekciev, by personal service.
3. Defendant Tufekciev lives in a secured building, and as of the date of filing of this Motion, has refused Plaintiff’s process server access. See Exhibit A attached hereto.
4. Accordingly, Plaintiff requests leave to serve the Defendant by publication.

WHEREFORE, the Plaintiff, WM CAPITAL MANAGEMENT, INC., AS SUCCESSOR IN INTEREST TO THE FEDERAL DEPOSIT INSURANCE

CORPORATION, AS RECEIVER FOR EDGEBROOK BANK, prays that this Honorable Court grant its Motion to Serve the Defendant by Publication and for such other relief as this Court deems just and reasonable.

Respectfully submitted,

WM CAPITAL MANAGEMENT, INC., AS
SUCCESSOR IN INTEREST TO THE FEDERAL
DEPOSIT INSURANCE CORPORATION, AS
RECEIVER FOR EDGEBROOK BANK, Plaintiff

KAVANAGH GRUMLEY & GORBOLD LLC

By: /s/ Jeffrey M. Archambeault
One of the Attorneys for Plaintiff

Jeffrey M. Archambeault, ARDC #6294837
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CERTIFICATE OF SERVICE

I hereby certify that on May 20, 2016, I electronically filed the above document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

KAVANAGH GRUMLEY & GORBOLD LLC

By: /s/Jeffrey M. Archambeault
Attorney for Plaintiff, WM CAPITAL
MANAGEMENT, INC. AS SUCCESSOR-IN-
INTEREST TO THE FEDERAL DEPOSIT
INSURANCE CORPORATION, AS RECEIVER
OF EDGEBROOK BANK

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